

Exhibit 51

Excerpts of deposition of Lucien Greaves
(November 6, 2023)

In the Matter Of:
SATANIC TEMPLE vs NEWSWEEK DIGITAL

1:22-cv-01343-MKV

LUCIEN GREAVES

November 06, 2023



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November 06, 2023

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1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 THE SATANIC TEMPLE, INC.,

5 Plaintiff,

6 -against-

Case No.

1:22-cv-01343-MKV

7 NEWSWEEK DIGITAL, LLC,

8 Defendant.

9
10 November 6, 2023
11 9:32 a.m.

12
13 Deposition of LUCIEN GREAVES, taken by
14 Defendant, held at 30 Rockefeller Plaza, New
15 York, New York, before Joseph R. Danyo, a
16 Shorthand Reporter and Notary Public within
17 and for the State of New York.
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A P P E A R A N C E S :

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By: CAMERON STRACHER, ESQ.
SARA TESORIERO, ESQ. (Via Zoom)

Also Present:

LAURA HENRIQUE, ESQ., Newsweek (Via Zoom)

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2 contacted about her following the release of the
3 documentary Hail Satan.

4 Q. Why is that?

5 A. Because the narrative arc of her
6 removal from The Satanic Temple was a part of
7 that. It was a part of that documentary.

8 Q. So she made statements in the
9 documentary about her removal and --

10 A. Well, she made public statements
11 about her removal before the documentary came
12 out. She wrote a Medium article, Medium is a
13 website that people can dump their content on, so
14 she wrote a Medium article listing these untrue
15 claims regarding her departure.

16 Q. Do you know if you spoke to a
17 journalist for the Washington Post about Jex?

18 A. I couldn't say specifically that it
19 was that I talked to somebody from the Washington
20 Post about her.

21 Q. Do you recall how many journalists
22 you spoke to about Jex?

23 A. No. It wasn't a primary question
24 people had following Hail Satan, but following
25 Hail Satan there were at times a lot of

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Q. Are you aware that Jex Blackmore said this in her Medium piece, and I quote, "While I was part of the organization, I witnessed male members of the organization exploit their position and influence inappropriately and disrespectfully towards women. I myself experienced harassment and abuse from members who have now left the organization."

Do you remember that statement from her Medium piece?

A. Well, yeah. I know she said that in her Medium piece, but I don't know what reality that's supposed to relate to. I don't know what instances she's claiming these happened, and further, like I said, at the point where we actually had an organizational structure, she essentially wasn't working with us anymore.

So the likelihood of those comments being true I think are pretty low. Even though you want to take those types of seriously, her history of deceptive answers as to her relationship with TST are enough to make me very skeptical.

Q. Are you aware of any claims of

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harassment or abuse made by Jex?

A. No, none.

Q. She says that, when she complained about it, she was asked to "let it all blow over." Are you aware of anyone that she spoke to about these claims?

A. No. I think she's, honestly I think she's lying about those things. I don't think there's any truth to it.

Q. What is the basis for saying that she's lying?

A. Because I feel like, if she was going to talk to anybody, she would have talked to me. I mean, you know, not to keep hammering on it, but she really wasn't working with us, and, when she would come around, she would talk to me. She would speak directly with me, and when she had first started, we had so few people that she was only just kind of working with me anyway.

So for her to suddenly come back after a couple of years and say, oh, I made these complaints, but nobody listened, and for me to not actually know those complaints, I feel like I have no idea who else she would have talked to,

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2 or after April of 2019?

3 A. You know, I don't. I'm pretty sure
4 it was before April of 2019. I think it was, I
5 think when it first was released in Sundance,
6 there was snow in Utah where we were, and I think
7 it was February.

8 Q. Okay. In the documentary Jex
9 Blackmore is portrayed as threatening to kill the
10 United States President at the time. Was that an
11 accurate portrayal of something that happened?

12 A. Yeah, and I don't think it was
13 presented in any deceptive context. I think her
14 words were very apparent in the footage that was
15 shown, and you know, I don't see any way she can
16 absolve herself of responsibility for those
17 words.

18 Q. After that scene, there was a scene
19 in which she received a phone call from you. Do
20 you remember that scene?

21 A. I do.

22 Q. What was the nature of that call?

23 A. To be honest, I can't be sure that
24 that was actually footage of when I called her to
25 tell her that she was kicked out of The Satanic

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Temple. Her being on the phone may have been staged for B roll, but in fact I did have a phone call with her after she was removed from her position from The Satanic Temple by unanimous vote from our national council at the time.

Q. I'm going to mark the Medium article that we've been addressing as Plaintiff's Exhibit 2.

(Plaintiff's Exhibit 2, Medium article titled The Struggle for Justice Is Ongoing, was so marked for identification, as of this date.)

Q. Do you remember the time frame in which Jex Blackmore was involved with TST?

A. Well, like I said, she started out with us very early on like 2014, and after like 2015 she pretty much wasn't doing anything with us, and she only kind of tried to revive her role I think in response to the fact that a documentary was being made, and she wanted to do what she could to maximize her own exposure utilizing the documentary, and towards that end she put together the event in which she claimed that some "we" were going to assassinate the

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President.

She put together this event without our knowing it, and this was after having performed other events without telling us about them, events that could directly impact our reputation and public image, she put together events like that previously, and then after the call for presidential assassination that is when it was unanimously mandated that she needed to be removed.

Q. Do you remember when the filming of Hail Satan began?

A. I believe filming for Hail Satan must have begun around 2016.

Q. Was Jex Blackmore aware prior to filming of the notion of a documentary being filmed?

A. I'm not sure when she became aware of a documentary being filmed, but I'm convinced that the documentary being filmed is what made her come back to identifying with us at all when holding events.

Q. Okay. Drawing your attention now to Plaintiff's Exhibit 2, I note the first sentence

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that they would be, but the rationale should be there as well.

Q. Was there any investigation into claims that Jex had been sexually harassed?

A. Not that I'm aware of, but I'm also not aware that she ever actually made a complaint or gave us anything to actually investigate.

Q. After the Medium article came out, were there any investigations into her claims that she had been sexually harassed?

A. Well, I take issue with the idea that she made an actual claim within the Medium article. She made a statement claiming that there were these circumstances giving very little to work off and also under circumstances where we knew that she had been lying about essentially everything else in the Medium article, that I don't think we viewed these claims of hers as actionable on our end.

Q. So the answer is no, there was no investigation after the Medium article came out?

A. Not that I'm aware of, but nor do I know what form that could take with such little

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information.

MR. STRACHER: Okay. No further
questions.

MR. KEZHAYA: No further questions of
mine.

(Time noted: 11:30 a.m.)

Subscribed and sworn to
before me this____day of_____, 2023.

C E R T I F I C A T I O N

I, JOSEPH R. DANYO, a Shorthand Reporter
and Notary Public, within and for the State of New
York, do hereby certify:

That I reported the proceedings in the
within entitled matter, and that the within transcript
is a true record of such proceedings.

I further certify that I am not related, by
blood or marriage, to any of the parties in this
matter and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 12th day of November, 2023.



JOSEPH R. DANYO

STATE OF NEW YORK

My Commission Expires 2/20/2027

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E X H I B I T S

Defendant's/Plaintiff's	Page
Exhibit 25 Document Bates stamped TST 37, TST 38, TST 39, TST 40 and TST 44	30
Exhibit 26 Document Bates stamped TST 41, TST 42, TST 43 and TST 45	30
Exhibit 27 Invoice dated 6/15/22 from Levick Strategic Communications, LP	56
Exhibit 28 Document Bates stamped TST 36	56
Exhibit 2 Medium article titled The Struggle for Justice Is Ongoing	67

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DEPOSITION ERRATA SHEET

Our Assignment No. 10478372
Case Caption: The Satanic Temple v Newsweek Digital

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my deposition taken in the above-captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the ____ day of _____
2023.

LUCIEN GREAVES

Subscribed and sworn to on the ____ day of _____, 2023 before me.

Notary Public in and for the State of New York.